

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
JOSEPH A. PERRUCCI	:	Chapter 13
CRYSTAL L. PERRUCCI	:	
	:	Bankruptcy No. 19-10345 PMM
Debtors	:	

**SUPPLEMENTAL APPLICATION FOR COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR SERVICES PERFORMED AFTER  
CONFIRMATION OF CHAPTER 13 PLAN**

David S. Gellert, Esquire, of David S. Gellert, P.C.,

applies under § 330 of the Code for an order directing the Chapter 13 Trustee to pay an award of compensation and reimbursement of actual, necessary expenses for services performed after confirmation of the Debtors' Chapter 13 Plan and represents:

Applicant is counsel for the Debtors.

1. The Debtors filed a petition under chapter 13 of the Bankruptcy Code on January 18, 2019.
2. The Debtors' First Amended Chapter 13 Plan was confirmed by the court on January 23, 2020.
3. The Debtors paid the applicant \$1,310.00 prior to the filing of the chapter 13 petition.
4. Applicant's prior application:

## First Application Period

03/28/2018 to 01/23/2020 Date of Order - 03/18/2020

	<u>Requested</u>	<u>Allowed</u>	<u>Paid</u>	<u>Due</u>
Fees	\$ 3,740.00	\$ 3,740.00	\$ 3,740.00	\$ 0.00
Expenses	\$ 349.10	\$ 349.10	\$ 349.10	\$ 0.00

5. Applicant requests an award of supplemental compensation of \$1,265.00 for 4.6 hours expended in providing the following services:

Review of Motion for Relief filed by Fulton Bank, N.A., with regard to the mortgage; review of payment history from attorneys for Fulton Bank, N.A.; preparation and filing of Answer to Motion for Relief; review Stipulation to settle Motion for Relief; preparation of Second Amended Chapter 13 Plan; preparation and filing of Motion to Modify Plan; preparation and filing of Supplement to Schedule I and Supplement to Schedule J; and various telephone conversations, e-mails, and correspondence with Debtors, Chapter 13 Trustee, and attorney for Fulton Bank, N.A.

6. Applicant requests that compensation be awarded at the hourly rate of \$275.00 per hour.
7. Applicant requests reimbursement of expenses in the amount of \$43.68 for the following expenses:

Postage to serve Motion to Modify Plan and Second Amended Chapter 13 Plan and postage to serve Supplemental Application for Compensation.

8. A copy of the applicant's disclosure of compensation pursuant to F.R.B.P. 2016(b) is attached as Exhibit "A."
9. Attached as Exhibit "B" is a copy of the applicant's time records setting forth the dates and amount of time expended for the services performed on behalf of the Debtors after confirmation of Debtors' Chapter 13 Plan.
10. All services rendered and expenses incurred for which compensation or reimbursement is requested
  - a. were performed or incurred for or on behalf of the Debtor, the services and expenses were actual and necessary, and the compensation requested for those services is reasonable; and
  - b. are not duplicative of services and expenses for which compensation or reimbursement was previously requested.
11. If this supplemental application is granted, the Debtor's confirmed Chapter 13 Plan is
  - X   is adequately funded.
  - is not adequately funded.

WHEREFORE, Applicant requests an award of \$1,265.00 in compensation and of \$43.68 in reimbursement of actual, necessary expenses.

Dated: December 13, 2022

s/ David S. Gellert

David S. Gellert, Esquire

David S. Gellert, P.C.

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